

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

ePLUS, INC.,)	
)	
Plaintiff,)	Civil Action No. 2:09-CV-232-HCM-TEM
)	
v.)	
)	
PERFECT COMMERCE, INC., SCIQUEST, INC., LAWSON SOFTWARE, INC., and VERIAN TECHNOLOGIES, INC.,)	
)	
Defendants.)	

**PLAINTIFF *ePLUS, INC.*'S ANSWERS AND OBJECTIONS TO DEFENDANT
LAWSON SOFTWARE, INC.'S FIRST SET OF INTERROGATORIES**

Pursuant to Fed. R. Civ. P. 33 and Local Rule 26(c), Plaintiff *ePlus, Inc.* ("*ePlus*" or "Plaintiff"), by and through its attorneys, serves the following Answers to the First Set of Interrogatories ("Interrogatories") propounded by Defendant Lawson Software, Inc. ("Defendant" or "Lawson") upon *ePlus*. These Answers are provided subject to, and without waiver of, *ePlus*'s previously stated Objections served on August 21, 2009 which are repeated below.

GENERAL OBJECTIONS

ePlus makes the following General Objections, whether or not separately set forth in response to each Interrogatory, to each and every instruction, definition, and question posed in the Interrogatories:

1. *ePlus* objects to Defendant's First Set of Interrogatories, including the Definitions and Instructions, to the extent they seek to impose discovery obligations beyond those imposed by the Local Rules of the United States District Court for the Eastern District of Virginia, the

Federal Rules of Civil Procedure, and/or other applicable law.

2. *ePlus* objects to the Interrogatories to the extent that they are vague, ambiguous, overly broad, unduly burdensome, unreasonably cumulative or duplicative, seek information that is more conveniently or less expensively obtained from another source, or seek information that is not reasonably calculated to lead to the discovery of admissible evidence.

3. *ePlus* objects to the Interrogatories to the extent that they seek information that is protected by the attorney-client privilege, work product doctrine and/or any other applicable privilege or immunity from discovery, including any jointly held privilege, or otherwise not properly subject to discovery under the Federal Rules of Civil Procedure. Documents and information subject to such claim of privilege will not be produced in connection with Defendant's discovery requests, and any inadvertent production of such documents or information shall not be deemed a waiver of any applicable privilege.

4. *ePlus* objects to the Interrogatories to the extent that they seek information that does not exist, or that is not reasonably available to or within the knowledge, possession, custody, or control of *ePlus*.

5. *ePlus* objects to the Interrogatories to the extent that they seek information that is already within the knowledge of Defendant or that is readily accessible to Defendant, as through public sources.

6. *ePlus* objects to each Interrogatory to the extent that it is duplicative of other discovery to be produced in this case or seeks information which is more easily available through other, less burdensome means.

7. *ePlus* objects to the Interrogatories to the extent that they seek information that is not relevant to the subject matter of this action or to a claim or defense of any party and/or is not reasonably calculated to lead to the discovery of admissible evidence.

8. *ePlus* objects to the Interrogatories to the extent that they fail to describe the requested information with reasonable particularity, are indefinite as to time or scope or otherwise not limited to a time frame relevant to this litigation and to the patents-in-suit, and are therefore unduly burdensome, oppressive, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence.

9. *ePlus* objects to the Interrogatories to the extent that they seek information which, if furnished, would violate any domestic or foreign judicial order, protective order or stipulation of confidentiality entered with respect to such information.

10. *ePlus* objects to the Interrogatories to the extent that they require a legal conclusion.

11. *ePlus* objects generally to each Interrogatory, Definition and Instruction to the extent that it purports to characterize the pleadings, claims or factual matters in or involving this matter.

12. *ePlus* objects to each Interrogatory, Definition or Instruction to the extent it is unlimited in time or otherwise not limited to a time frame relevant to this litigation.

13. *ePlus* objects to the Definition of “*ePlus*,” “*You*,” “*Your*” and “*Plaintiff*” as overly broad and unduly burdensome to the extent that each definition improperly includes persons or entities not within *ePlus*’s control, and/or who are otherwise not within the scope of discovery contemplated by the Federal Rules of Civil Procedure. *ePlus* further objects to Defendant’s definition of “*ePlus*” as overly broad and unduly burdensome to the extent that such

definition covers subsidiaries or other related companies whose information and documents are neither relevant to the subject matter of this action nor likely to lead to the discovery of admissible evidence.

14. *ePlus* objects to the Instruction in Paragraph 16 of Defendant's Interrogatories to the extent it seeks to impose discovery obligations beyond those imposed by the Local Rules of the United States District Court for the Eastern District of Virginia, the Federal Rules of Civil Procedure, and/or other applicable law. *ePlus* further objects to this Instruction as overly broad and unduly burdensome.

15. *ePlus* objects to the Definition of "electronic data" to the extent it seeks to impose discovery obligations beyond those imposed by the Local Rules of the United States District Court for the Eastern District of Virginia, the Federal Rules of Civil Procedure, and/or other applicable law. *ePlus* further objects to this Instruction as overly broad and unduly burdensome. *ePlus* further objects to the Definition of "document" and "documents" to the extent it incorporates the Definition of "electronic data."

16. *ePlus* objects to the Definition of "Defendant" and "Defendants" as vague, ambiguous, overly broad, and unduly burdensome.

17. *ePlus* objects to the Definition of "accused product(s)" as vague and ambiguous.

ePlus expressly incorporates each of the foregoing General Objections into each of the Specific Objections set forth below. No response to an Interrogatory shall be understood as, nor is it intended to be, a waiver of any General Objection or any Specific Objection that may be separately stated with respect to any response. Nor shall any response to an Interrogatory be deemed to constitute any agreement or concession that the subject matter thereof is relevant to this action.

All of the responses set forth below are made without waiving or intending to waive any objection, including but not limited to objections as to competency, relevancy, materiality, authenticity, privilege, or admissibility. ePlus reserves the right to revise or supplement its responses to the Interrogatories at any time should additional responsive information be discovered and/or additional claims be asserted. ePlus also reserves the right to assert additional objections at any time.

SPECIFIC OBJECTIONS AND ANSWERS

INTERROGATORY NO. 1:

For each Defendant's accused product ePlus believes infringes any asserted claim of any patent-in-suit, state all facts concerning ePlus forming its belief that such product infringes, including, but not limited to, whether ePlus contends the product infringes the claim literally or under the doctrine of equivalents, the date that ePlus first learned of the product, the date ePlus first came to believe the product was infringing, the persons, documents and things involved in informing ePlus about the product and in forming ePlus's belief that the product is infringing, and all efforts that ePlus undertook to substantiate its belief that the product is infringing, including, but not limited to, all acquisition, testing and reverse-engineering of such products and the individuals involved in such efforts.

OBJECTIONS:

ePlus objects to this Interrogatory to the extent that it calls for information protected from discovery by the attorney-client privilege and/or the work product doctrine. ePlus also objects to this Interrogatory as duplicative, overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. ePlus objects to this Interrogatory as premature because fact discovery has just commenced and Lawson has not yet produced any documents in response to ePlus' document requests. Any meaningful response to this Interrogatory is predicated on Lawson's responses to discovery requested by ePlus which has not yet been answered. ePlus further objects to this Interrogatory to the extent that it seeks information that readily accessible to Defendant, as through public sources. Additionally, ePlus

objects to this Interrogatory as vague, ambiguous and overly burdensome to the extent that it relies on the definition of “Defendants.”

ePlus further objects to this Interrogatory, with multiple subparts, to the extent that it exceeds the number of interrogatories permitted by the Rules. Further, ePlus objects to this Interrogatory as a premature attempt to elicit expert testimony and as premature in that the Court has yet to construe the claims of the patents.

Subject to and without waiver of its General and Specific Objections, ePlus will provide a response to this Interrogatory.

ANSWER TO INTERROGATORY NO. 1

Subject to the foregoing objections, ePlus responds as follows. Since we have yet to receive the discovery requested from Lawson, ePlus reserves the right to supplement this Answer. Moreover, because Lawson’s products and services continue to evolve, and the tort of infringement is continuing, ePlus reserves the right to supplement this Answer based on any changes in, or modification to, the Lawson products at issue.

At present, based upon the publicly available information concerning Lawson’s products, ePlus contends that Lawson directly and indirectly infringes claims 1-45 of U.S. Patent No. 6,023,683 (the “’683 Patent”), claims 1-29 of the U.S. Patent No. 6,055,516 (the “’516 Patent”), and claims 1-5 of U.S. Patent No. 6,505,172 (the “’172 Patent”). ePlus first became aware of Lawson’s infringement on or before February, 2009.

Attached as Exhibits 1-3 are claim charts setting forth ePlus’s preliminary infringement analyses with respect to illustrative claims from each of the patents-in-suit based on publicly-available information. Concurrently herewith, ePlus is producing documents which were utilized to support these preliminary infringement analyses, which documents have yet to be produced by Lawson.

ePlus currently contends that Lawson literally infringes the asserted claims, but given that the Court has yet to construe any disputed terms of the patent claims, and Lawson has yet to respond to *ePlus*'s outstanding discovery requests, *ePlus* reserves the right to rely on the doctrine of equivalents for its infringement contentions.

ePlus maintains its objections to providing a response concerning the efforts *ePlus* undertook to substantiate its belief that Lawson's products infringe as such efforts are protected from discovery pursuant to the attorney-client privilege and/or work product doctrine.

INTERROGATORY NO. 2

Describe any and all facts and circumstances relating to all charges or allegations of infringement for each Defendant (including correspondence suggesting possible infringement or giving notice of the patent(s) with or without an express allegation of infringement) involving the patents-in-suit or related patents or related foreign patents, regardless of whether suit was filed, fully identifying all persons who have been charged or to whom allegations were made, and identify all documents that show, discuss and/or otherwise relate in any way to any such charges or allegations, including any responses thereto.

OBJECTIONS:

ePlus objects to this Interrogatory to the extent that it calls for information protected from discovery by the attorney-client privilege and/or the work product doctrine. *ePlus* also objects to this Interrogatory as vague, ambiguous, duplicative, overly broad and unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. *ePlus* further objects to this Interrogatory to the extent that it seeks information that readily accessible to Defendant, as through public sources. Additionally, *ePlus* objects to this Interrogatory as vague, ambiguous and overly burdensome to the extent that it relies on the definition of "Defendants."

ePlus further objects to this Interrogatory, with multiple subparts, to the extent that it exceeds the number of interrogatories permitted by the Rules.

Subject to and without waiver of its General and Specific Objections, *ePlus* will provide a

response to this Interrogatory.

ANSWER TO INTERROGATORY NO. 2

Lawson has had knowledge of the patents-in-suit since no later than October 2003, at which time *ePlus* began marking its commercial products covered by the patents-in-suit pursuant to 35 U.S.C. § 287(a). *ePlus* has been systematically and continuously marking its patented products since that time. *See, e.g., ePlus* trial exhibits 600 and 754 from *ePlus v. SAP* litigation (produced as ePLUS 0009339-40, 0009390-91, 0027401, 0028482, 0030545, 0037014-15, 0047323-24, 0113980, 0113995 and 0229212-20).

Lawson competes with *ePlus* for customers and sales of Electronic Sourcing and Procurement Systems and Services and, on information and belief, has actual knowledge that *ePlus*'s Electronic Sourcing and Procurement Systems are patented.

On information and belief, Lawson has direct knowledge from press reports and independent investigation of *ePlus*'s patent rights.

ePlus made allegations of infringement against Lawson when it filed its Complaint in the U.S. District Court for the District of Delaware on May 4, 2009. Additionally, such charges of infringement were contained in the Complaint filed in the current litigation on May 19, 2009.

INTERROGATORY NO. 3

Identify each document you relied upon in preparing your pleadings or which you reasonably expect to be used to support or contest any allegation in the pleadings.

OBJECTIONS:

ePlus objects to this Interrogatory to the extent that it calls for information protected from discovery by the attorney-client privilege and/or the work product doctrine. *ePlus* further objects to this Interrogatory as premature. *ePlus* also objects to this Interrogatory as vague, ambiguous, duplicative, overly broad and unduly burdensome, and not reasonably calculated to lead to the

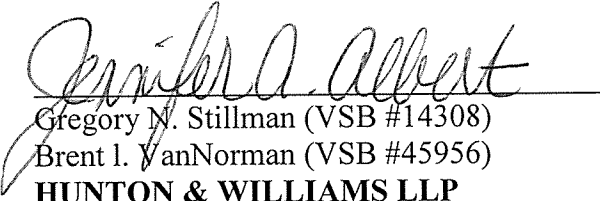
discovery of admissible evidence.

ANSWER TO INTERROGATORY NO. 3

ePlus maintains its above-stated objections. At the present time, ePlus is without knowledge concerning what documents it will rely upon to support its allegations (with the exception of those set forth in its preliminary infringement analyses) as Lawson has yet to produce documentation concerning the functionality of its accused e-procurement applications or respond to interrogatories in a meaningful manner. ePlus will supplement its answer to this interrogatory and/or produce responsive documents once it receives discovery from Lawson and makes a determination that it will rely upon particular documents or other evidence to support or contest particular allegations.

Respectfully submitted,

Date: September 8, 2009


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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of September, 2009, I will serve Plaintiff ePlus inc's Answers and Objections to Defendant Lawson Software, Inc.'s First Set of Interrogatories, on the following counsel of record as indicated:

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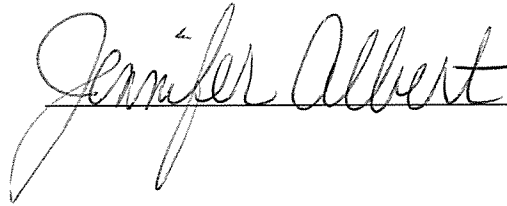


EXHIBIT 1

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
16. An electronic sourcing system comprising:	<p>Lawson makes, uses and sells electronic sourcing systems in accordance with the claim which include as components Lawson Procurement, Lawson PunchOut, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition and Lawson Purchase Order in its S3 suite of products. In addition, Lawson offers its M3 e-Procurement suite of products which enables a buying organization to search suppliers' product catalogs, create requisitions and generate purchase orders.</p> <p>According to Lawson, "with Lawson Procurement Punchout, you enjoy pre-built integration to a large universe of individual trading partners and digital marketplaces." See web page entitled "Procurement Punchout" available at www.lawson.com/wcw.nsf/pub/scms_4AB022 (ePLUS 0241026-28).¹ "With Lawson Requisitions Self-Service, internal customers can create their own requisitions online, while you automate the requisition approval process. users may benefit from any advanced capabilities, such as the ability to generate multiple purchase orders ... from a single requisition." See web page entitled "Requisitions Self Service" available at www.lawson.com/wcw.nsf/pub/scms_4AB044 (ePLUS 0241043-45).</p>	<p>Lawson induces the direct infringement of the claims by licensing and/or selling its customers the Lawson Procurement, Lawson Punchout, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition, Lawson Purchase Order and other Lawson e-procurement applications in its S3 and M3 suites of products and/or enabling its customers to implement and use the electronic sourcing systems of the claim recitations.</p> <p>Lawson designed, built, operated and maintained the Lawson Digital Depot, "a comprehensive new Internet-based procurement and supply management system" which integrates all commerce-related interfaces and processes via an e-commerce hub, and includes a value-added information e-service aggregating catalog information from all industry-leading manufacturers, wholesalers and distributors." In addition, Lawson Digital Depot was "delivered as a complete business-to-business commerce system [including] the Digital Depot e-commerce hub and catalog. ..."</p> <p>Lawson also sells implementation, installation and consultation services to assist its customers with the installation, implementation and use of the infringing systems. Further, Lawson provides maintenance services to its customers to further assist them in using the infringing systems.</p> <p>Lawson has entered into relationships with digital marketplaces, supplier portals and the like which host multiple supplier product catalogs. Through these arrangements, Lawson is able to offer its e-procurement customers access to multiple supplier</p>

¹ Documents referenced in the claim chart are being produced concurrently herewith.

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>at least two product catalogs containing data relating to items</p>	<p>Users of the Lawson e-procurement applications can access multiple supplier product catalogs. See "Procurement Punchout" available at www.lawson.com/wcw.nsf/pub/scms_4AB022 (ePLUS 0241026-28); MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241629-31); Presentation entitled "Lawson Data Management Services" (ePLUS 0240895-928); "Indirect Purchasing - A Competitive Advantage?" available at www.lawson.com/wcw.nsf/pub/ebz_BD93D3 (ePLUS 0240737-39) (indicating that Lawson M3 e-Procurement enables "employees to source, requisition and receive products and services ... suppliers to manage and upload product and services catalog content" and that Lawson M3 e-Procurement "covers all internal indirect procurement processes such as creating requisitions ... as well as all external indirect procurement processes such as all communication with suppliers ... order confirmations and handling of supplier catalogs"); "Lawson Unveils On-Line Procurement/Supply Chain System" available at http://findarticles.com/p/articles/mi_m0EIN/is_2000_March_24/ai_60590827 (ePLUS 0240827-28) (describing Lawson's Digital Depot which includes an e-service aggregating catalog information from all industry-leading manufacturers, wholesalers and distributors); "Lawson e-Procurement Description" available at www.spendsoftware.com/procurementsoftware/lawson-e-procurement.html (ePLUS 0240822) (describing the functionality of Lawson's e-Procurement application as including "integration] with vendor systems, [enabling]</p>	<p>product catalogs. See, e.g., Presentation entitled "Lawson Data Management Services," dated 10/17/2007.</p> <p>See description above. Lawson enables users of its e-procurement applications to access multiple supplier catalogs via Lawson Punchout and its relationships with digital marketplaces hosting multiple supplier product catalogs.</p>

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
	<p>your internal electronic catalogs [to] be automatically updated with new vendor pricing and availability information." Or, alternatively, "catalogs can be hosted and managed by vendors [and] can offer punchout shopping ..."; IDII Software Newsletter, Vol. 3, No. 3, dated 2/11/2002, available at www.idii.com/esn/vol3num03.htm (ePLUS 0240726-36 at ePLUS 0240729) (describes Lawson's e-Procurement for Healthcare solution as "allow[ing] healthcare organizations to search multi-supplier, multi-media rich catalogs, create requisitions and purchase orders, and process transactions in real time within a fully integrated business solution environment").</p>	
<p>such that an item in a first catalog is generally equivalent with an item in a second catalog; and</p>	<p>Each supplier catalog contains data about items. Data in the catalogs is organized hierarchically by mapping each item data record to a universal commodity code, such as the UNSPSC code, when input into the catalog database. The commodity codes, in turn, are mapped to product categories in a catalog hierarchy tree. The catalog hierarchy tree is organized to drill down to more specific levels within a product category. This category hierarchy tree mapping of product commodity codes to product categories is then indexed into the search structure. Thus, when a user conducts a hierarchical search using the catalog search engine, or a search by UNSPSC code (which is hierarchical in nature), the search engine performs a lookup and the mapping, or cross-referencing, of the product categories in the hierarchy tree to the associated commodity code will retrieve all item data records in the catalog database which are mapped to the commodity code associated with the product category in the catalog hierarchy.</p> <p>Thus, an item offered by a first supplier in the first supplier's catalog which falls within the selected</p>	<p>See description above.</p>

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>converting means for converting data relating to said item from said first catalog to data relating to said item from said second catalog.</p>	<p>product category of the catalog hierarchy is generally equivalent to an item offered by a second supplier in the second supplier's product catalog which also falls within the selected product category of the catalog hierarchy since both items were mapped, or cross-referenced, to the same commodity code.</p> <p>See IDII Software Newsletter, Vol. 3, No. 3, dated 2/1/2002, available at www.idii.com/esn/vol3num03.htm (ePLUS 0240726-36 at ePLUS 0240729) (describing Lawson Requisitions Self-Service application as including "category-based (UNSPSC) multi-level search capability"); presentation entitled "Lawson Data Management Services" dated 10/17/2007 (ePLUS 0240895-928 at ePLUS 0240902, ePLUS 0240914) (indicating that the catalog item data includes "classification to UNSPSC taxonomy" and utilizes the UNSPSC categorization for "hierarchical classification of supplies by segment, family, class and commodity"); MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656) (indicating that the Lawson Requisitions Self Service application includes a search engine which can search a product hierarchy to refine search results and drill down the hierarchy and that you can shop using a "Catalog Drilldown" feature to drill down a product category hierarchy).</p>	<p>See description above.</p>

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
17. An electronic sourcing system as recited in claim 16, wherein at least one catalog database contains said data from each of said catalogs,	above. See description above for claim 16. Lawson's e-procurement applications provide users of its applications with access to product catalogs of multiple suppliers in a variety of ways. Such supplier catalogs can be hosted internally by the buying organization. <i>See, e.g.</i> , "Lawson e-Procurement Description" available at www.spendsoftware.com/procurementsoftware/lawson-e-procurement.html (ePLUS 0240822).	
and said converting means includes a non-catalog database containing a cross-reference table such that use of a reference code corresponding to an entry in said cross-reference table links said item from said first catalog to data relating to said item from said second catalog.	See description above for claim 16. The non-catalog database is the lookup table which contains the maps, or cross-references, between each product category for the catalog hierarchy and its associated commodity code and the maps, or cross-references, between each item data record and its associated commodity code.	See description above.
21. An electronic sourcing system comprising: a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	See description above for claim 16. The Lawson e-procurement applications include a requisition module (<i>e.g.</i> , Lawson Requisitions and Lawson Requisitions Self Service in the S3 Suite and the Purchase Order Processing module of the Procurement application in the M3 suite). These requisition modules automatically build requisitions. They each include a user-interface which includes data fields which enable the user to enter criteria corresponding to a desired item, such as supplier name or Item ID, for example. <i>See, e.g.</i> , "Welcome to the Lawson Web Requisition-A-Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241403-04).	See description above for claim 16.
a catalog collection searching	The Lawson e-procurement applications include a	See description above.

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
module, said searching module including a collection of catalogs of items stored in an electronic format,	catalog search engine for executing searches of catalog databases. As described above with respect to claim 16, a buying or organization's catalog database can include a collection of product catalogs of multiple suppliers. Data relating to items offered by the suppliers are stored in the catalogs in electronic format. <i>See</i> Presentation entitled "Lawson Data Management Services" (ePLUS 0240895-928).	
a catalog selection criteria used to select less than said entire collection,	A user of Lawson's e-procurement system can select to search less than the entire collection of product catalogs stored in the catalog database by inputting selection criteria into the user interface, such as inputting a search query to search for products associated with a particular supplier, for example. <i>See, e.g.</i> , MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656) (illustrating selection of one supplier catalog among multiple supplier catalogs available); "Welcome to the Lawson Web Requisition-A Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241403) (illustrating capability to search by manufacturer).	<i>See</i> description above.
said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	The Lawson search engine will execute a search in response to the user's input search query and retrieve item data records from the catalog(s) selected that match the search query criteria. The information for the matching items may include additional information about the matching items that can be used in building the requisition, such as part number, price, etc., which are then included in data fields of the requisition-in-process. <i>See, e.g.</i> , "Welcome to Lawson Web Requisition-A Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241403, ePLUS 0241407).	<i>See</i> description above.
a multiple purchase order generation module, said purchase	Once the user of the Lawson e-procurement application submits a requisition for approval, the	<i>See</i> description above.

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search module criteria;	Lawson e-procurement application funnels the requisition through the approval process. Immediately upon approval of the requisition, the Lawson e-procurement application automatically generates purchase orders (typically one per supplier) for the requisitioned items and dispatches the purchase orders to the appropriate suppliers over the Internet. <i>See</i> web page entitled "Requisitions Self Service" available at www.lawson.com/wcw.nsf/pub/scms_4AB044ePLUS0241043-45 (indicating that Lawson's Requisitions Self-Service application enables users to "automatically generate multiple purchase orders... from a single requisition").	
wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	<i>See</i> description above with respect to claim 16.	<i>See</i> description above.
wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	As described above, the Lawson e-procurement application can search multiple catalogs of items offered by multiple suppliers. The Lawson catalog search engine conducts searches to locate items from multiple supplier product catalogs that match the user's search criteria. the located items that match the user's search criteria are generally equivalent since they match all the search criteria. Moreover, if the search criteria includes conducting a catalog category drill-down search that makes use of the Lawson system's UNSPSC category hierarchy, such UNSPSC category hierarchy is a determination system that finds	<i>See</i> description above.

Preliminary Infringement Analysis for U.S. Patent No. 6,055,516

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.</p>	<p>generally equivalent items because items at the same level of the hierarchy are all cross-referenced to the same commodity code. <i>See, e.g.</i> MD Anderson "Online Ordering Tutorial & User Guide" (ePLUS 0241625-56 at ePLUS 0241642-44) (describing use of Catalog Drilldown type search through the category hierarchy); Lawson Requisitions Self-Service User Guide (ePLUS 0241502-540 at ePLUS 0241520, ePLUS 0241524) (describing Categories feature and UNSPSC codes).</p>	<p><i>See</i> description above.</p>

EXHIBIT 2

Preliminary Infringement Analysis for U.S. Patent No. 6,023,683

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>1. An electronic sourcing system comprising:</p>	<p>Lawson makes, uses and sells electronic sourcing systems in accordance with the claim which include as components Lawson Procurement, Lawson PunchOut, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition and Lawson Purchase Order in its S3 suite of products. In addition, Lawson offers its M3 e-Procurement suite of products which enables a buying organization to search suppliers' product catalogs, create requisitions and generate purchase orders.</p> <p>According to Lawson, "with Lawson Procurement Punchout, you enjoy pre-built integration to a large universe of individual trading partners and digital marketplaces." See web page entitled "Procurement Punchout" available at www.lawson.com/mcw.nsf/pub/scms_4AB022 (ePLUS 0241026-28).¹ "With Lawson Requisitions Self-Service, internal customers can create their own requisitions online, while you automate the requisition approval process. . . . users may benefit from any advanced capabilities, such as the ability to generate multiple purchase orders . . . from a single requisition." See web page entitled "Requisitions Self Service" available at www.lawson.com/mcw.nsf/pub/scms_4AB044 (ePLUS 0241043-45).</p>	<p>Lawson induces the direct infringement of the claims by licensing and/or selling its customers the Lawson Procurement, Lawson Punchout, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition, Lawson Purchase Order and other Lawson e-procurement applications in its S3 and M3 suites of products and/or enabling its customers to implement and use the electronic sourcing systems of the claim recitations.</p> <p>Lawson designed, built, operated and maintained the Lawson Digital Depot, "a comprehensive new Internet-based procurement and supply management system" which integrates all commerce-related interfaces and processes via an e-commerce hub, and includes a value-added information e-service aggregating catalog information from all industry-leading manufacturers, wholesalers and distributors." In addition, Lawson Digital Depot was "delivered as a complete business-to-business commerce system [including] the Digital Depot e-commerce hub and catalog. . . ."</p> <p>Lawson also sells implementation, installation and consultation services to assist its customers with the installation, implementation and use of the infringing systems. Further, Lawson provides maintenance service to its customers to further assist them in using the infringing systems.</p> <p>Lawson has entered into relationships with digital marketplaces, supplier portals and the like which host multiple supplier product catalogs. Through these arrangements, Lawson is able to offer its e-</p>

¹ Documents referenced in this claim chart are being produced concurrently herewith.

Preliminary Infringement Analysis for U.S. Patent No. 6,023,683

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>at least two product catalogs data relating to items associated with the respective sources;</p>	<p>Users of the Lawson e-procurement applications can access multiple supplier product catalogs. <i>See</i> "Procurement Punchout" available at www.lawson.com/wcw.nsf/pub/sems_4AB022 (ePLUS 0241026-28); MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241629-31); Presentation entitled "Lawson Data Management Services;" "Indirect Purchasing - A Competitive Advantage?" available at www.lawson.com/wcw.nsf/pub/ebz_BD93D3 (ePLUS 0240737-39) (indicating that Lawson M3 e-Procurement enables "employees to source, requisition and receive products and services ... suppliers to manage and upload product and services catalog content" and that Lawson M3 e-Procurement "covers all internal indirect procurement processes such as creating requisitions ... as well as all external indirect procurement processes such as all communication with suppliers ..., order confirmations and handling of supplier catalogs"); "Lawson Unveils On-Line Procurement/Supply Chain System" available at http://findarticles.com/p/articles/mi_m0EIN/is_2000_March_24/ai_60590827 (ePLUS 0240827-28) (describing Lawson's Digital Depot which includes an e-service aggregating catalog information from all industry-leading manufacturers, wholesalers and distributors); "Lawson e-Procurement Description" available at www.spendsoftware.com/procurementsoftware/lawson-e-procurement.html (ePLUS 0240822) (describing the functionality of Lawson's e-Procurement application as including</p>	<p>procurement customers access to multiple supplier product catalogs. <i>See, e.g.</i>, Presentation entitled "Lawson Data Management Services," dated 10/17/2007.</p> <p><i>See</i> description above. Lawson enables users of its e-procurement applications to access multiple supplier catalogs via Lawson Punchout and its relationships with digital marketplaces hosting multiple supplier product catalogs.</p>

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
	<p>“integrat[ion] with vendor systems, [enabling] your internal electronic catalogs [to] be automatically updated with new vendor pricing and availability information.” Or, alternatively, “catalogs can be hosted and managed by vendors [and] can offer punchout shopping...”; IDII Software Newsletter, Vol. 3, No. 3, dated 2/11/2002, available at www.idii.com/esn/vol3num03.htm (ePL US 0240726-36 at ePL US 0240729) (describes Lawson's e-Procurement for Healthcare solution as “allow[ing] healthcare organizations to search multi-supplier, multi-media rich catalogs, create requisitions and purchase orders, and process transactions in real time within a fully integrated business solution environment.”).</p>	
means for selecting the product catalogs to search;	<p>The Lawson e-procurement application includes a catalog search engine and a graphical user interface.</p> <p>A user of Lawson's e-procurement application can select among (1) catalogs hosted by suppliers, (2) an internal database containing multiple supplier catalogs, and (3) digital marketplaces with multiple suppliers' catalog data. <i>See</i> “Lawson e-Procurement Description” available at www.spendsoftware.com/procurementsoftware/lawson-e-procurement.html (ePL US 0240822) (describing the functionality of Lawson's e-procurement application as including “integrat[ion] with vendor systems, [enabling] your internal electronic catalogs [to] be automatically updated with new vendor pricing and availability information.” Or, alternatively, “catalogs can be hosted and managed by vendors [and] can offer punchout shopping...”).</p>	<i>See</i> description above.
means for searching for matching items among the selected product	The Lawson e-procurement applications enable a user to search for matching items among the	<i>See</i> description above.

Preliminary Infringement Analysis for U.S. Patent No. 6,023,683

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
catalogs;	<p>selected product catalogs. The Lawson e-procurement applications include a catalog search engine.</p> <p>The catalog search engine allows the user to input a search query to find items in the selected product catalogs that match the input search query or a user can browse through the hierarchical trees of product categories in the product catalogs selected. <i>See</i> presentation entitled "Lawson Data Management Services" (ePLUS 0240895-928); MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656); "Welcome to the Lawson Web Requisition-A Guide for the Beginning Requester" (ePLUS 0241625-656 at ePLUS 0241637-38) (illustrating capability to search by manufacturer and other types of search queries).</p>	
means for building a requisition using data relating to selected matching items and their associated source(s);	<p>The Lawson e-procurement applications provide the ability to build a requisition using data related to selected matching items and their associated sources.</p> <p>Selected matching items returned in a search may be added to a shopping cart with a click of a mouse. The Lawson e-procurement applications automatically generate requisitions and funnel them through the approval process.</p> <p>The requisition generated includes data relating to selected matching items and their associated sources, or suppliers. <i>See, e.g.</i>, "Welcome to Lawson Web Requisition - A Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241406-07); Presentation entitled "Lawson S3 Requisitions Self-Service Overview" at 10-11 available at www.lawson.com/webinar/rss/index.htm.</p>	See description above.
means for processing the	The Lawson e-procurement application processes a	See description above.

Preliminary Infringement Analysis for U.S. Patent No. 6,023,683

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
requisition to generate one or more purchase orders for the selected matching items; and	requisition to generate one or more purchase orders for the selected matching items. Immediately upon approval of a requisition, the Lawson e-procurement application creates purchase orders (typically one per supplier) and can electronically dispatch them to suppliers. See "Requisitions Self Service" available at www.lawson.com/wcw.nsf/pub/scms_4AB044 (ePLUS 0241043-45) (indicating that Lawson's Requisitions Self-Service application enables users to "automatically generate multiple purchase orders... from a single requisition."); Lawson e-Procurement Administration Guide (ePLUS 0241541-590 at ePLUS 0241555) ("When users have filled their shopping carts (virtually speaking) and checked out from the vendor [punchout] web site, the chosen items and their cost are returned to the Lawson server where a requisition is created using the Requisitions Self Service application. After the requisition is interfaced in the Lawson Purchase Order system, e-Procurement enables the transmission of purchase order documentation back to the vendor so that the vendor can fill the order").	See description above.
means for determining whether a selected matching item is available in inventory.	The Lawson e-procurement application includes this capability. For example, many supplier catalogs include availability information in the item's detailed description data. See, e.g., MD Anderson Online Order Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241639-40).	See description above.
14. An electronic sourcing system comprising:	See description at claim 1 above.	See description at claim 1 above.
data relating to items associated with at least two sources maintained so that selected data may be searched separately;	See claim 1.	See claim 1.

Preliminary Infringement Analysis for U.S. Patent No. 6,023,683

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
means for searching for matching items among the selected data;	See claim 1.	See claim 1.
means for building a requisition using data relating to selected matching items and their associated source(s);	See claim 1.	See claim 1.
means for processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	See claim 1.	See claim 1.
means for converting data relating to selected matching item and an associated source to data relating to an item and a different source.	In the Lawson e-procurement applications, the product data in supplier catalogs is mapped hierarchically. The catalog hierarchy is a mapping from product category to a commodity code (such as the UNSPSC code) associated with a product category. Each item in a product catalog is also mapped to its associated commodity code. An item offered by a first supplier, or source, can be cross-referenced to a similar item from a second supplier, or source, because both the first and second items are mapped to the same commodity code. The Lawson catalog search engine enables a user to perform searches for items across multiple supplier product catalogs using hierarchical trees of product categories (each of which product category is mapped to a commodity code). By drill-down searching the branches and leaves of the product category hierarchy tree, a user can obtain a first item associated with a first source and a cross-referenced similar item from a second source, both items having been cross-referenced to a common commodity code. Multiple similar items are mapped to the commodity code associated with such branch or leaf of the category	See description above.

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
	<p>hierarchical tree.</p> <p>As Lawson explains, "The Categories feature is designed to use UNSPSC (United Nations Standard Products and Service Codes) The codes have four levels: segment, family, class and commodity. These levels create an item hierarchy and let the user search each level... These codes are attached to items..." Lawson Requisitions Self-Service User Guide (ePLUS 0241502-540 at ePLUS 0241520); "MD Anderson Online Ordering Tutorial & User Guide" (ePLUS 0241625-656 at ePLUS 0241642-44) ("To shop using the catalog drilldown click (1) drop-down menu in the left navigation.... You will navigate through a product hierarchy to refine your drilldown.").</p>	See description above with respect to claim 1.
31. A method comprising the steps of: matching a database containing data relating to items associated with at least two sources;	Lawson's e-procurement application operating on a computer system performs the claimed method. As described above with respect to claim 1, a user of Lawson's e-procurement application can access a database that contains data relating to items associated with multiple sources.	See description above.
searching for matching items among the data relating to the items;	As described above under claim 1, Lawson's e-procurement application operating on a computer system performs a method that includes the step of searching for matching items among the data relating to the items.	See description above.
building a requisition using data relating to selected matching items and their associated sources;	As described above under claim 1, Lawson's e-procurement application operating on a computer system performs a method that includes a step of building a requisition using data related to selected matching items and their associated sources	See description above.
processing the requisition to generate purchase orders using data relating to the selected matching items	As described above under claim 1, Lawson's e-procurement application operating on a computer system performs a method that includes a step of processing the requisition to generate purchase	See description above.

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
and their associated source(s); and	orders relating to the selected matching items and their associated sources.	
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	As described above under claim 14, Lawson's e-procurement application operating on a computer system performs a method that includes a step of converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	See description above.

EXHIBIT 3

Preliminary Infringement Analysis for U.S. Patent No. 6,505,172

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
1. An electronic sourcing system comprising:	<p>Lawson makes, uses and sells electronic sourcing systems in accordance with the claim which include as components Lawson Procurement, Lawson PunchOut, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition and Lawson Purchase Order in its S3 suite of products. In addition, Lawson offers its M3 e-Procurement suite of products which enables a buying organization to search suppliers' product catalogs, create requisitions and generate purchase orders.</p> <p>According to Lawson, "with Lawson Procurement Punchout, you enjoy pre-built integration to a large universe of individual trading partners and digital marketplaces." See web page entitled "Procurement Punchout" available at www.lawson.com/wcw.nsf/pub/scms_4AB022 (ePLUS 0241026-28).¹ "With Lawson Requisitions Self-Service, internal customers can create their own requisitions online, while you automate the requisition approval process users may benefit from any advanced capabilities, such as the ability to generate multiple purchase orders ... from a single requisition." See web page entitled "Requisitions Self Service" available at www.lawson.com/wcw.nsf/pub/scms_4AB044 (ePLUS 0241043-45).</p>	<p>Lawson induces the direct infringement of the claims by licensing and/or selling its customers the Lawson Procurement, Lawson Punchout, Lawson Requisitions, Lawson Requisitions Self-Service, Lawson Web Requisition, Lawson Purchase Order and other Lawson e-procurement applications in its S3 and M3 suites of products and/or enabling its customers to implement and use the electronic sourcing systems of the claim recitations.</p> <p>Lawson designed, built, operated and maintained the Lawson Digital Depot, "a comprehensive new Internet-based procurement and supply management system" which integrates all commerce-related interfaces and processes via an e-commerce hub, and includes a value-added information e-service aggregating catalog information from all industry-leading manufacturers, wholesalers and distributors." In addition, Lawson Digital Depot was "delivered as a complete business-to-business commerce system [including] the Digital Depot e-commerce hub and catalog, ..."</p> <p>Lawson also sells implementation, installation and consultation services to assist its customers with the installation, implementation and use of the infringing systems. Further, Lawson provides maintenance service to its customers to further assist them in using the infringing systems.</p> <p>Lawson has entered into relationships with digital marketplaces, supplier portals and the like which host multiple supplier product catalogs. Through these arrangements, Lawson is able to offer its e-</p>

¹ Documents referenced in the claim chart are being produced concurrently herewith.

Preliminary Infringement Analysis for U.S. Patent No. 6,505,172

Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
<p>a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;</p>	<p>Users of Lawson's e-procurement applications can access internal and external catalogs and marketplaces. <i>See</i> "Procurement Punchout" available at www.lawson.com/wcw.nsf/pub/scms_4AB022 (ePLUS 0241026-28); MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241629-31); presentation entitled "Lawson Data Management Services" (ePLUS 0240895-928); "Indirect Purchasing-A Competitive Advantage?" available at www.lawson.com/wcw.nsf/pub/ebz_BD93D3 (ePLUS 0240737-39) (indicating that Lawson M3 e-Procurement enables "employees to source, requisition and receive products and services ... suppliers to manage and upload product and services catalog content" and that Lawson M3 e-Procurement "covers all internal indirect procurement processes such as creating requisitions ... as well as all external indirect procurement processes such as all communication with suppliers...., order confirmations and handling of supplier catalogs"); "Lawson Unveils On-Line Procurement/Supply Chain System" available at http://findarticles.com/articles/mi_m0EIN/is_2000_March_24/ai_60590827 (ePLUS 0240827-28) (describing Lawson's Digital Depot which includes an e-service aggregating catalog information from all industry leading manufacturers, wholesalers and distributors); "Lawson e-Procurement Description" available at www.spendsoftware.com/procurementsoftware/lawson-e-procurement.html (ePLUS 0240822) (describing the functionality of Lawson's e-</p>	<p><i>See</i> description above.</p> <p>procurement customers access to multiple supplier product catalogs. <i>See, e.g.</i>, Presentation entitled "Lawson Data Management Services," dated 10/17/2007.</p>

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
	Procurement application as including "integration] with vendor systems, [enabling] your internal catalogs [to] be automatically updated with new vendor pricing and availability information." Or, alternatively, "catalogs can be hosted and managed by vendors [and] can offer punchout shopping ...").	
means for entering product information that at least partially describes at least one desired item;	<p>The Lawson e-procurement application operating on a computer system includes a graphical user interface to enable a user to input information to conduct a search for items and a catalog search engine which performs a search program.</p> <p>A user of the Lawson e-procurement application can input into the graphical user interface various search queries, attributes and parameters that now at least partially describe a desired item or product, such as, "category," "price," "product number or ID," or "manufacturer." <i>See</i> MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241636-44); "Welcome to the Lawson Web Requisition-A Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241404).</p>	<i>See</i> description above.
means for searching for matching items that match the entered product information in the selected portions of the database;	<p>The Lawson e-procurement application includes a user interface and a catalog search engine that allows the user to search for items that match the entered product information, <i>i.e.</i>, the search query, product attributes or parameters in the selected portion of the database. Matching items are returned as results of the input search query. <i>See</i> MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241636-44); "Welcome to the Lawson Web Requisition-A Guide for the Beginning Requester" (ePLUS 0241397-416 at ePLUS 0241404).</p>	<i>See</i> description above.
means for generating an order list that includes at least one matching item selected by said	The Lawson e-procurement application has functionality to build an order list, referred to as a "shopping cart," from the data generated by	<i>See</i> description above.

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
means for searching;	selecting at least one matching item from those matching items returned by the catalog search engine as results matching the search query. <i>See</i> Lawson Requisitions Self-Service User Guide (ePLUS 0241502-540 at ePLUS 0241523) (“[t]he shopping cart displays the total number of items and the total transaction amount in base currency. The shopping cart dynamically builds quantity and amount for items in the cart.”); “Welcome to the Lawson Web Requisition-A Guide for the Beginning Requester” (ePLUS 0241397-416 at ePLUS 0241407).	
means for building a requisition that uses data obtained from said database relating to selected matching items on said order list;	The Lawson e-procurement application has functionality to build a requisition from the data generated by selecting at least one matching item (from the data retrieved in the search of the database) for inclusion in the order list, or shopping cart. The Lawson e-Procurement application automatically generates a requisition from the shopping cart and funnels the requisition through the approval process. <i>See</i> Lawson Requisitions Self-Service User Guide (ePLUS 0241502-540 at ePLUS 0241523, 0241535); Lawson Financial System Requisition Approval User's Manual (ePLUS 0241483-93).	<i>See</i> description above.
means for processing said requisition to generate purchase orders for said selected matching items.	The Lawson e-procurement application can be used to process the requisition to automatically generate purchase orders (typically one per supplier) for the selected matching items included in the requisition. <i>See</i> “Requisitions Self Service” available at www.lawson.com/wcw.nsf/pub/scms_4AB044 (ePLUS 0241043-45) (indicating that Lawson's Requisitions Self Service application enables users to “automatically generate multiple purchase orders ... from a single requisition.”); Lawson e-Procurement Administration Guide (ePLUS 0241541-590 at ePLUS 0241555) (“When users have filled their shopping carts (virtually speaking)	<i>See</i> description above.

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Claim	Lawson's Direct Infringement	Lawson's Indirect Infringement
5. The electronic sourcing system according to claim 1, further comprising means for determining whether a selected matching item is available in inventory.	<p>and checked out from the vendor [punchout] web site, the chosen items and their costs are returned to the Lawson server where a requisition is created using the Requisitions Self Service application. After the requisition is interfaced in the Lawson Purchase Order system, e-Procurement enables the transmission of purchase order documentation back to the vendor so the vendor can fill the order.”)</p> <p>The Lawson e-procurement application includes functionality to determine whether a selected matching item is availability in inventory. For example, many supplier catalogs include availability information in the item's detailed description data. <i>See, e.g.,</i> MD Anderson Online Ordering Tutorial & User Guide (ePLUS 0241625-656 at ePLUS 0241639-40).</p>	<i>See</i> description under claim 1 above.